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California Regional Water Quality Control Board, San Diego Region

July 5, 2017

Mr. Jason Golumbskie-Jones
Environmental Director
Naval Base Coronado
Public Works Office, Building 3
P.O. Box 357088
San Diego, CA 92135

In reply refer to:
834567: oosibodu

Subject: Notice of Applicability for Order WQ 2014-0153-DWQ, United States Navy Silver Strand Training Complex-South Onsite Wastewater Treatment System

Mr. Golumbskie-Jones:

This Notice of Applicability (NOA) enrolls the United States Navy Silver Strand Training Complex-South onsite wastewater treatment system (OWTS) in Order WQ 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order). The United States Navy (Navy) is required to comply with the requirements specified in this NOA and all applicable requirements in the General Order. A copy of the General Order is enclosed with this NOA and is available online at:

http://www.swrcb.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0153_dwq.pdf

The Navy submitted a Report of Waste Discharge (ROWD) to the California Regional Water Quality Control Board, San Diego Water Board (San Diego Water Board) on March 22, 2017. The ROWD describes the proposed OWTS that will serve facilities to be constructed at the Silver Strand Training Complex-South (SSTC-S).

1. FACILITY AND DISCHARGE DESCRIPTION

The SSTC-S is located on Naval Base Coronado, California, which is within the Coronado Hydrologic Area (Coronado HA 910.10). Infrastructure upgrades to be completed at the SSTC-S will include the construction of the P-893 and P-797 facilities. The P-797 project consists of three separate buildings including an Administration building, a Warehouse, and a Training facility. The three buildings house administrative space, toilet and locker facilities, storage, classrooms and training spaces. The P-893 project consists of two separate buildings that will provide office and administrative space, toilet and locker facilities, "cage" areas for personal gear storage, warehouse space, storage and laydown areas, and rooftop training space for assigned personnel. The P-893 facility will share the same general space with the P-797 facility.

The OWTS to be installed to serve the P-893 and P-797 facilities will consist of a 20,000-gallon septic tank and horizontal seepage pit. Other facilities to be constructed at the SSTC-S will also be served by one or more additional OWTS. However, any OWTS at the SSTC-S with a design flow below 10,000 gallons per day will be regulated by the County of San Diego Department of Environmental Health under its Local Agency Management Plan. The Navy also plans to remove all OWTS within the SSTC-S during the fourth quarter of 2018, and connect the wastewater discharges to the City of Imperial Beach's sanitary sewer system.

2. CALIFORNIA ENVIRONMENTAL QUALITY ACT

The project consists of enrolling the proposed new OWTS in the General Order by issuing this Notice of Applicability. Construction and operation of new OWTS is not within the scope of the California Environmental Quality Act (CEQA) document prepared for the General Order by the State Water Resources Control Board. Thus, this project requires an independent CEQA evaluation by the San Diego Water Board.

Under CEQA, state and local agencies may use environmental documents prepared in accordance with the National Environmental Policy Act (NEPA) to satisfy CEQA obligations under certain circumstances (see title 14, California Code of Regulations, section 15221).¹ Because environmental review requirements may differ under NEPA and CEQA, a NEPA document may be augmented as necessary to satisfy any additional CEQA requirements (see title 14 section 15221(b)). The Navy prepared the *Final Naval Base Coronado Coastal Campus Environmental Impact Statement* (EIS), dated March 2015 to satisfy the requirements of NEPA. The EIS assesses environmental impacts and mitigation measures for all infrastructure improvements and expansion of the Naval Base Coronado Coastal Campus, including the OWTS to be installed to serve P-893 and P707. The EIS does not contain a separate discussion of greenhouse gas emissions or growth inducing impacts. The San Diego Water Board is the lead agency under CEQA for this project. The San Diego Water Board has prepared an addendum to the EIS that addresses greenhouse gas emissions and growth inducing impacts as they apply to the construction and operation of the OWTS.

The addendum to the EIS and other CEQA related documents prepared by the San Diego Water Board for the project are available online at:

<http://www.waterboards.ca.gov/sandiego/>

The San Diego Water Board circulated the addendum for public review and a notice informing the public that it intends to rely on the addendum and EIS to satisfy CEQA obligations. The public notice was posted on the San Diego Water Board webpage on May 23, 2017, and was published in the San Diego Union Tribune on May 27, 2017.

¹Hereinafter, all references to title 14 within this letter will be from the California Code of Regulations.

Pursuant to title 14, section 15221, the San Diego Water Board has considered the EIS and addendum, and the project's environmental effects as described in those documents. Based on the findings in the EIS and addendum, the San Diego Water Board has concluded that any potentially significant environmental impacts from the treatment of, and discharge of domestic wastewater from the OWTS serving the SSTC-S can be mitigated to less than significant levels.

3. SITE SPECIFIC REQUIREMENTS

The operator of the OWTS must be familiar with the requirements contained in the General Order, this NOA, and the Monitoring and Reporting Program (MRP) in Section 4 below.

The General Order contains prohibitions and specifications that apply to all wastewater systems, and specifications that apply only to specific treatment and/or disposal systems. The Discharger shall comply with the following specific requirements below:

a. Required Plans

The Discharger shall submit the following plans as described below:

- i. A Spill Prevention and Emergency Response Plan consistent with the requirements of General Order Provision E.1.a. to be received by the San Diego Water Board by 5:00 p.m. on October 12, 2017.
- ii. A Sampling and Analysis Plan consistent with the requirements of General Order Provision E.1.b to be received by the San Diego Water Board by 5:00 p.m. on October 12, 2017.
- iii. A Sludge Management Plan consistent with the requirements of General Order Provision E.1.c to be received by the San Diego Water Board by 5:00 p.m. on October 12, 2017

b. Setback Requirements

Septic tanks or subsurface disposal systems added must maintain the applicable setbacks specified in Table 3 of the General Order.

4. MONITORING AND REPORTING PROGRAM

The Discharger shall comply with the monitoring requirements below which are based on the Monitoring and Reporting Program of the General Order.

- a. Submit quarterly and annual monitoring reports as described in Sections A and B of Attachment C of the General Order respectively. The first quarterly report to be submitted is the July-September 2017 quarterly report, which must be received by the San Diego Water Board by 5:00 p.m. on **November 1, 2017**. The first annual report to

be submitted is the October-December 2017 annual report, which must be received by the San Diego Water Board by 5:00 p.m. on **March 1, 2018**.

- b. Septic tank effluent shall be monitored as described in Table 1 below. A liquid grab sample shall be collected from the septic tank as close to the outlet pipe as practicable.

Table 1. Septic Tank Effluent Monitoring

Constituent	Units ^a	Sample Type	Sample Frequency ^b	Reporting Frequency ^b
Total Nitrogen	mg/L	Grab	Annually	Annually
Nitrate (as N)	mg/L	Grab	Annually	Annually
Chloride	mg/L	Grab	Annually	Annually
Methylene Blue Activated Substances	mg/L	Grab	Annually	Annually

Table Notes:

a. mg/L denotes milligrams per liter.

b. Annually is defined as a period of 12 consecutive calendar months beginning on January 1.

- c. The septic tank shall be monitored for the following:

Table 2. Septic Tank Monitoring

Parameter	Units	Measurement Type	Inspection/Reporting Frequency ^a
Sludge depth and scum thickness in each compartment of each tank	Feet	Staff Gauge	Annually
Distance between bottom of scum layer and bottom of outlet device	Inches	Staff Gauge	Annually
Distance between top of sludge layer and bottom of outlet device	Inches	Staff Gauge	Annually
Effluent filter condition (if equipped, clean as needed)	Not Applicable	Not Applicable	Annually

Table Notes

- a. Quarterly is defined as a period of three consecutive calendar months beginning on January 1, April 1, July 1, or October 1.

Septic tanks shall be pumped when any one of the following conditions exists:

- i. The combined thickness of sludge and scum exceeds one-third of the tank depth of the first compartment.
- ii. The scum layer is within 3 inches of the outlet device.
- iii. The sludge layer is within 8 inches of the outlet device.

If a septic tank is pumped during the year, the pumping report shall be submitted with the annual report. All pumping reports shall be submitted with the next regularly scheduled monitoring report. At a minimum, the record shall include the date, nature of service, service company name, and service company license number.

- d. Monitoring of the subsurface disposal (horizontal seepage pit) area is required to determine if wastewater is evenly applied, the disposal area is not saturated, burrowing animals and deep rooted plants are not present, and odors are not present. Inspection of dosing pump controllers, automatic distribution valves, etc. is required to maintain optimum treatment in the disposal area (and any sand or media filter if present).

The Discharger shall maintain and inspect the subsurface disposal area **quarterly** as described below and include a written description of observations made and maintenance activities performed in **quarterly monitoring reports submitted**. Inspection and maintenance of the subsurface disposal area, shall include the following:

- i. Inspect all pump controllers and automatic distribution valves as recommended by the manufacturer to ensure proper operation.
- ii. Inspect the disposal area for saturated conditions.
- iii. Remove deep rooted plants that can damage the OWTS or subsurface disposal system (shallow-rooted plants are generally desirable).
- iv. Investigate evidence of animal burrowing immediately and control burrowing animal populations as necessary.
- v. Seepage pits shall be inspected to ensure they are allowing wastewater to infiltrate as designed. Visual inspection of the water level in the seepage pit is adequate.

5. ENFORCEMENT

Please review this NOA carefully to ensure that it completely and accurately reflects the discharge. If the discharge violates the terms or conditions listed in the NOA or the General Order, the San Diego Water Board may take enforcement action, including assessment of administrative civil liability. Prior to allowing changes to the wastewater strength; expanding the OWTS via addition of new septic tanks, leach fields, or seepage pits; or changing the method of waste disposal; you must contact the San Diego Water Board to determine if you

need to submit a Report of Waste Discharge. The Discharger is primarily responsible for compliance with the General Order and this NOA. Failure to comply with the requirements in the General Order or in this NOA could result in an enforcement action as authorized by provisions of the Water Code. Discharges of wastes other than domestic wastewater are prohibited.

6. ANNUAL FEES AND SAN DIEGO WATER BOARD CONTACT INFORMATION

The discharge has a threat to water quality and complexity rating of 3-C. The annual fee corresponding to a threat to water quality and complexity of 3-C is specified in the current fee schedule;² however, based on the flow rate, the discharge qualifies for the 50-percent fee discount. The first annual fee for this discharge is therefore \$1,044.³ The fee is due and payable on an annual basis until enrollment in the General Order is formally terminated. To terminate enrollment, you must provide written notice that the wastewater discharge has ceased so that the San Diego Water Board may terminate enrollment and avoid unnecessary billing.

Please review the conditions specified in this NOA and applicable sections of the General Order and notify the San Diego Water Board if for any reason the discharge is not able to comply with any of the conditions specified in this NOA or the General Order.

Please submit all required monitoring reports and documents required by the General Order to the San Diego Water Board by email. The email submittals must include a signed cover letter (with the facility name, facility contact information, and reference code **834567:00sibodu**). Monitoring reports, documents, and other email submittals must be sent to sandiego@waterboards.ca.gov. Routine email correspondence may be sent directly to individual San Diego Water Board staff members.

Documents that are 50 megabytes or larger should be transferred to a disk and mailed to the San Diego Water Board. For more extensive information provided in larger documents, the San Diego Water Board staff may request that specific individual items such as appendices to large or complex technical reports, large drawings, grading plans, or maps continue to be provided in paper format. If you have specific questions about email submittal procedures, please contact Ms. Cleo Muniz of our Mission Support Services Unit at (619) 521-3384, or via email at Cleo.Muniz@waterboards.ca.gov.

² http://www.waterboards.ca.gov/resources/fees/water_quality/

³ Annual fees are periodically updated by the State Water Board in Calif. Code Regs. title 23, section 2200: https://www.waterboards.ca.gov/laws_regulations/#ccr

Please contact Mr. Fisayo Osibodu at 619-521-8036 or via email at Olufisayo.Osibodu@waterboards.ca.gov if you have any questions or comments.

Respectfully,



David W. Gibson
Executive Officer
DG:jgs: jac:jro:oo

Enclosure:

Order WQ 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems*

cc w/o enclosure: Mr. Lance DeClue; County of San Diego Department of Environmental Health;
lance.declue@sdcounty.ca.gov

Mr. John Locke; Naval Base Coronado Public Works Office, Environmental Office;
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CIWQS INFO	
Place ID	834567
Party IDs	554618/554619
Regulatory Measure ID	412786